

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

**WSOU INVESTMENTS, LLC D/B/A  
BRAZOS LICENSING AND  
DEVELOPMENT,**  
*Plaintiff,*

**v.**

**CANON, INC.,**  
*Defendant.*

---

**CANON, INC.,**  
*Third- Party Plaintiff,*

**v.**  
**NXP USA, Inc.,**  
*Third-Party Defendant.*

**CIVIL ACTION 6:20-cv-00980-ADA  
CIVIL ACTION 6:20-cv-00981-ADA  
CIVIL ACTION 6:20-cv-00982-ADA**

**PATENT CASE**

**JURY TRIAL DEMANDED**

**CIVIL ACTION 6:20-cv-00980-ADA**

**JOINT MOTION FOR ENTRY OF AGREED PROTECTIVE ORDER**

Plaintiff WSOU Investments, LLC, Defendant Canon, Inc. and Third-Party Defendant NXP USA, Inc., respectfully submit this Joint Motion for Entry of Agreed Protective Order, which is attached hereto as Exhibit 1.

Date: September 24, 2021

Respectfully submitted,

By: /s/ Mark D. Siegmund  
Jonathan K. Waldrop (CA Bar No. 297903)  
(Admitted in this District)  
jwaldrop@kasowitz.com  
Darcy L. Jones (CA Bar No. 309474)  
(Admitted in this District )  
djones@kasowitz.com  
Marcus A. Barber (CA Bar No. 307361)  
(Admitted in this District)

mbarber@kasowitz.com  
John W. Downing (CA Bar No. 252850)  
(Admitted in this District)  
jdowning@kasowitz.com  
Heather S. Kim (CA Bar No. 277686)  
(Admitted in this District)  
hkim@kasowitz.com  
Jack Shaw (CA Bar No. 309382)  
(Admitted in this District)  
jshaw@kasowitz.com  
**KASOWITZ BENSON TORRES LLP**  
333 Twin Dolphin Drive, Suite 200  
Redwood Shores, California 94065  
Telephone: (650) 453-5170  
Facsimile: (650) 453-5171

Mark D. Siegmund (TX Bar No. 24117055)  
mark@waltfairllc.com  
**LAW FIRM OF WALT FAIR, PLLC**  
1508 N. Valley Mills Drive  
Waco, TX 76710  
Telephone: (254) 772-6400  
Facsimile: (254) 772-6432

**ATTORNEYS FOR PLAINTIFF  
WSOU INVESTMENTS, LLC  
d/b/a BRAZOS LICENSING AND  
DEVELOPMENT**

By: /s/ John M. Jackson  
John M. Jackson (Texas Bar No. 24002340)  
jjackson@jw.com  
**JACKSON WALKER, LLP**  
2323 Ross Avenue, Suite 600  
Dallas, TX 75201  
Tel: (214) 953-6000  
Fax: (214) 953-5822

Joseph A. Calvaruso (*pro hac vice*)  
jcalvaruso@orrick.com  
Richard F. Martinelli (*pro hac vice*)  
rmartinelli@orrick.com  
**ORRICK, HERRINGTON & SUTCLIFFE LLP**  
51 West 52nd Street  
New York, NY 10019-6142  
Tel: (212) 506-5000  
Fax: (212) 506-5151

**ATTORNEYS FOR DEFENDANT  
CANON INC.**

By: /s/ Richard S. Zembek

Richard S. Zembek (SBN 00797726)

[Richard.zembek@nortonrosefulbright.com](mailto:Richard.zembek@nortonrosefulbright.com)

**NORTON ROSE FULBRIGHT US LLP**

Fulbright Tower

1301 McKinney, Suite 5100

Houston, Texas 77010-3095

Tel: (713) 651-5151

Fax: (713) 651-5246

Adam Schramek (SBN 24033045)

[adam.schramek@nortonrosefulbright.com](mailto:adam.schramek@nortonrosefulbright.com)

Eric C. Green (SBN 24069824)

[eric.green@nortonrosefulbright.com](mailto:eric.green@nortonrosefulbright.com)

**NORTON ROSE FULBRIGHT US LLP**

98 San Jacinto Boulevard, Suite 1100

Austin, Texas 78701

Tel: (512) 474-5201

Fax: (512) 536-4598

**COUNSEL FOR THIRD-PARTY  
DEFENDANT NXP USA, INC.**

**CERTIFICATE OF SERVICE**

Pursuant to the Federal Rules of Civil Procedure and Local Rule CV-5, I hereby certify that, on September 24, 2021, all counsel of record who have appeared in this case are being served with a copy of the foregoing via the Court's CM/ECF system.

/s/ Mark D. Siegmund

Mark D. Siegmund